

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**IOENGINE, LLC.,**

Plaintiff,

v.

**ROKU, INC.,**

Defendant.

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Case No. 6:21-cv-01296-ADA-DTG

JURY TRIAL DEMANDED

**DEFENDANT’S SECOND AMENDED TRIAL WITNESS LIST**

Defendant Roku, Inc. (“Defendant” or “Roku”) submits the following list of persons whom they will call or may call at trial live (in person or via video link) or by deposition. Defendant reserves the right to: (1) call their witnesses in any order, (2) call any witness appearing on Plaintiff’s witness list, (3) call undesignated rebuttal and/or impeachment witnesses, whose testimony cannot be reasonably foreseen until presentation of Plaintiff’s evidence, (4) call any other witness who has been deposed in this matter by deposition should the Court determine that the witness is unavailable to testify in person or in response to rulings by the Court (including any pending motions), (5) call additional witnesses to provide foundational testimony should any party contest the authenticity or admissibility of any materials selected to be used at trial, and (6) reasonably supplement or amend this Witness List through and including the time of trial to the extent permitted by the Court. If other witnesses to be called at trial become known, their names, addresses, and subject of their testimony will be reported to opposing counsel in writing as soon as they are known; this does not apply to rebuttal or impeachment witnesses. Roku may present deposition testimony, including in the event that any of the individuals listed below as witnesses

that Roku intends to call become unable to attend trial or are otherwise unable to provide live testimony or are not called. Time estimates provided below are preliminary, based on a reasonable estimation at this time. These estimates may change as the issues in the case are further streamlined for trial, will vary depending on the issues presented in IOENGINE's case-in-chief, and do not include time estimates for the cross-examination of IOENGINE's witnesses.

<b>Witness</b>	<b>May/Will Call</b>	<b>Live/Deposition &amp; Estimated Time</b>
Scott de Haas	Will Call	Live (0.75 hour)
Wim Michiels	Will Call	Live (0.75 hour)
Kevin Bright	Will Call	Live (0.50 hour)
Dr. Samuel Russ	Will Call	Live (3.5 hours)
Lauren Kindler	Will Call	Live (1.5 hours)
Steve Sprich	May Call	Deposition (0.50 hour)
Prateek Tandon	May Call	Live or Deposition (0.30 hour)
Lally Narwal	May Call	Live or Deposition (0.50 hour)
Timothy Yoo	May Call	Live or Deposition (0.30 hour)
Qingji Zheng	May Call	Deposition (0.10 hour)
Scott McNulty	May Call	Live or Deposition (0.20 hour)
Bhavin Desai	May Call	Deposition (0.10 hour)
Frank Franze	May Call	Deposition (0.10 hour)

April 8, 2024

Respectfully submitted,

/s/ Tia D. Fenton

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***COUNSEL FOR DEFENDANT  
ROKU, INC.***

**CERTIFICATE OF SERVICE**

I certify that this document is being served upon all counsel of record for Plaintiff on April 8, 2024 via email.

/s/ Holly Engelmann  
Holly Engelmann